

United States District Court

DISTRICT OF NEW HAMPSHIRE

United States of America

v.

Ian Freeman

CASE NUMBER: 1:21-cr-000041

MOTION FOR BILL OF PARTICULARS AND NAMES OF WITNESSES

NOW COMES the Defendant, Ian Freeman, by and through counsel, and respectfully moves for the following information as specific facts and witness are required by the defendant to be adequately placed on notice.

As grounds for and in support of, the Defendant states as follows:

1. The Defendant is charged in this Court with numerous offenses.
2. Those offenses are announced in a Superseding Indictment dated April 25, 2022.
3. Many material allegations in that indictment fail to place the Defendant on notice. Preparation for Trial is impossible without certain specific facts and witnesses disclosed.
4. In paragraph #6 of the Superseding Indictment, the accusation is devoid of the specific “institutions” referred to and the “customers” that were instructed to falsely claim that payments were church donations.
5. Paragraph #7 fails to name any individual that was the subject of a “romance scam”. The Defendant denies being knowingly involved in any such transaction and requires the specific names of the alleged victims in order to properly defend himself, as of the date of this pleading, no victim names have been specifically disclosed.

6. With regard to paragraph 14 of the Superseding Indictment, the government fails to specify which financial institutions it is referring to; fails to place the Defendant on notice as to who the government claims he “paid” to open bank accounts; fails to name what individuals met on localbitcoins.com and sold them bitcoin in exchange for fiat currency; fails to name just who was instructed to “falsely describe deposits into their accounts as ‘church donations’”.
7. Paragraph 37 is a sweeping allegation devoid of specifics resulting in the Defendant not being placed on adequate notice to properly defend himself.
8. Paragraph 40 fails to set forth any amount allegedly owed to the I.R.S. rendering Mr. Freeman without knowledge of that the tax liability he is allegedly required to pay.
9. Paragraph 43 alleges a \$5,000,000 figure without specificity. The amount itself without specific references is a bold prejudicial monetary figure. That alleged amount without support set forth in that paragraph places the Defendant in a position where he is unable to defend himself.
10. Many items set forth in Paragraph #44 predate the 2016 start date of the Superseding Indictment. The Government should be placed on notice that if they are unable to establish a 2016 to March 15, 2021, date of acquisition, those items pre-dating 2016 should be immediately stricken from the forfeiture count as their inclusion would unduly prejudice the Defendant.

WHEREFORE, The Defendant prays that said information and witnesses be immediately produced in order to ensure a fair trial in which the Defendant is on notice and capable of mounting effective defenses. (4th 5th, 6th, and 14th amendments to the United States Constitution).

Respectfully Submitted,

July 29, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name

387 Dover Road

Address

Chichester, NH 03258

City

State

Zip Code

(603) 224-4220

Phone Number

CERTIFICATION

I hereby certify that a copy of this appearance was forwarded to Seth Aframe, Esq. and Georgiana MacDonald, Esq of the U.S. District Attorney's Office, electronically through EFC on July 29, 2022.

July 29, 2022

Date

/s/ Mark L Sisti

Signature

Mark L. Sisti

Print Name